

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

| | | |
|-------------------------------|---|-----------------------|
| CONTENT SQUARE SAS and |) | |
| CONTENT SQUARE ISRAEL LIMITED |) | |
| (f/k/a Clicktale Limited), |) | |
| |) | |
| Plaintiffs, |) | |
| |) | C.A. No. 20-832 (LPS) |
| v. |) | |
| |) | |
| QUANTUM METRIC, INC., |) | |
| |) | |
| Defendant. |) | |

**STIPULATION AND [PROPOSED] ORDER
TO STAY PENDING *INTER PARTES* REVIEW**

WHEREAS Plaintiffs Content Square SAS and Content Square Israel Limited (collectively, “Content Square”) amended their complaint on June 10, 2021, to add allegations of infringement of an additional patent, U.S. Patent No. 10,749,976 (“’976 Patent”) (D.I. 50);

WHEREAS Content Square to date has asserted some or all of U.S. Patent Nos. 7,941,525 (“’525 Patent”); 9,508,081 (“’081 Patent”); 9,792,365 (“’365 Patent”); 10,063,645 (“’645 Patent”); 10,079,737 (“’737 Patent”); and the ’976 Patent against Defendant Quantum Metric, Inc. (“Quantum Metric”);

WHEREAS the Court granted Quantum Metric’s motion to dismiss with respect to the ’645 Patent and the ’737 Patent (D.I. 33);

WHEREAS Quantum Metric answered the operative complaint on June 17, 2021, and added counterclaims alleging Content Square is infringing Quantum Metric’s U.S. Patent No. 11,036,823 (D.I. 52);

WHEREAS the Patent Trial and Appeal Board (“PTAB”) instituted *inter partes* review (“IPR”) of the ’525 Patent on July 19, 2021 (IPR2021-00464) and of the ’081 Patent on July 19, 2021 (IPR2021-00363);

WHEREAS an institution decision from the PTAB concerning IPR2021-00530 challenging the ’365 Patent is expected on or before September 8, 2021;

WHEREAS the parties have conferred and agree that a stay of the above-captioned case at least until the final written decision in all currently instituted IPR proceedings is in the best interest of the parties and promotes judicial economy¹;

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED by the parties, subject to the approval of the Court, that:

1) the above-captioned case is stayed until such time as the last of the final written decisions in all currently instituted IPR proceedings;

2) all existing case deadlines are hereby vacated; and

3) the parties shall submit a joint status report, with their respective proposals as to the next steps, within 30 days after the last of the final written decisions in all currently instituted IPR proceedings have been issued.

¹ By agreeing to this stay, the parties do not waive their right to seek additional stays.

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August 6, 2021

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*Attorneys for Defendant and
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IT IS SO ORDERED this _____ day of August 2021.

United States District Judge